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January 17, 2006

Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

RE: **Docket No. R-1238**
Regulations H and Y

Dear Ms. Johnson:


I just read an article pertaining to the advance notice of proposed rulemaking (ANPR) addressing the risk-weighted capital requirements for banks.

I have made the observation, based on approximately 40 years of banking, that the banking rule-making bodies only have "one paintbrush and one bucket of paint." All banks seem to have to abide by the same or similar regulations regardless of the following:

- the risk each size institution represents to the FDIC and the financial industry;
- the number of staff available, or lack thereof, to comply with regulations, including their competency;
- the cost to comply as a percent of assets, since assets produce the gross profit to cover overhead costs;
- if it is a rural bank or a metropolitan bank.

My point is this: Please make regulations that relate to the true risk that an institution's size and geographic location present to the national financial industry.

Sincerely,



John L. Franklin
President & CEO

JLF/wc